

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

AMERICAN CRUISE LINES, INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 13-324 (RGA)
)	
HMS AMERICAN QUEEN STEAMBOAT)	
COMPANY LLC, and AMERICAN QUEEN)	
STEAMBOAT OPERATING COMPANY,)	
LLC,)	
)	
Defendants.)	

DEFENDANTS' PROPOSED VOIR DIRE QUESTIONS

Defendants, HMS American Queen Steamboat Company LLC and American Queen Steamboat Operating Company, LLC, by counsel, submit the following proposed *voir dire* questions for the Jury in this case. Defendants reserve the right to supplement these questions prior to trial.

1. HAS ANYONE HERE EVER STARTED YOUR OWN BUSINESS?
 - a. IF YES, PLEASE TELL US ABOUT THAT
2. DOES ANYONE HERE HAVE ANY FAMILIARITY WITH TRADEMARKS?
 - a. IF YES, WHAT CONTEXT?
 - b. WHAT TRADEMARK?
 - c. WHAT HAPPENED?
3. HAS ANYONE HERE, OR A FAMILY MEMBER OR CLOSE FRIEND, EVERY APPLIED FOR A TRADEMARK?
 - a. IF YES, PLEASE TELL US ABOUT THAT

4. HAS ANYONE HERE, OR AN IMMEDIATE FAMILY MEMBER, EVER TAKEN A CRUISE?
 - a. WHAT CRUISE?
 - b. WHEN WAS IT?
 - c. HOW OFTEN HAVE YOU TAKEN CRUISES
 - d. ANY PARTICULAR CRUISE LINE
5. HAS ANYONE HERE EVER RECEIVED A MAILER OR OTHER ADVERTISEMENT FOR A RIVER CRUISE?
 - a. PLEASE TELL US ABOUT HAT
 - b. DO YOU REMEMBER WHAT COMPANY
6. HAS ANYONE HERE EVER SEEN PRODUCT ADVERTISING THAT SEEMED TO BE TRYING TO MISLEAD CUSTOMERS ABOUT WHO MADE THE PRODUCT?
 - a. IF YES, PLEASE TELL US ABOUT THAT
7. HAS ANYONE HERE EVER HAD ANY OF THE FOLLOWING EXPERIENCES:
 - a. SERVED ON A CIVIL JURY
 - b. BEEN A PARTY IN A LAWSUIT
 - c. FILED A WORKERS COMPENSATION CLAIM
 - d. TESTIFIED UNDER OATH
 - e. FOR ANYONE WHO HAS SAID YES, CAN YOU EXPLAIN?
8. THIS CASE IS ABOUT TWO COMPANIES THAT ARE DIRECT COMPETITORS. HAS ANYONE HERE EVER WORKED IN A HIGHLY COMPETITIVE INDUSTRY?
 - a. IF YES, PLEASE EXPLAIN

Dated: September 20, 2017

Respectfully submitted,

s/Richard A. Barkasy

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